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October 7, 2019

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: WC Docket No. 11-42 – Lifeline and Link Up Reform and Modernization – Petition for
Waiver of National Verifier Launch by the New York State Public Service Commission

Dear Secretary Dortch:

The enclosed Petition for a Waiver of the National Verifier Launch is submitted on behalf of the New York State Public Service Commission (NYPSC), pursuant to the Federal Communications Commission's (FCC) Public Notice announcing the hard launch of the National Lifeline Eligibility Verifier (National Verifier)¹ for all new Lifeline enrollments in New York State on October 23, 2019. Pursuant to this notice, NYPSC respectfully submits the Petition which asks for a temporary waiver of the timeframe for implementation of the National Verifier.²

In 2016, the FCC directed the Universal Service Administrative Company (USAC) to establish a comprehensive nationwide system to determine eligibility for the FCC's

¹ Public Notice DA 19-936, Wireline Competition Bureau Announces the Launch of the National Lifeline Eligibility Verifier for All New Enrollments in Eleven States, WC Docket 11-42.

² The views expressed herein are not intended to represent those of any individual member of the NYPSC. Pursuant to the New York Public Service Law (PSL) §12, the Chair is authorized to file comments on behalf of the NYPSC.

Universal Service Fund Lifeline program, the National Verifier.³ Beginning in November 2018 and continuing into the present, USAC is implementing the National Verifier hard launch for all new enrollments into the Lifeline program. On September 23, 2019 FCC issued a notice to New York State announcing that it will be hard launched into the National Verifier, effective October 23, 2019.

The hard launch by USAC of the National Verifier in other states has had implementation difficulties from the beginning. Among the most significant challenges is that USAC has not had access to data for state administered low-income programs such as SNAP and Medicaid. Without access to state enrollment data using Application Programming Interfaces (“APIs”) to automatically (system to system) verify a Lifeline applicant’s participation in a qualifying low-income program, USAC must manually attempt to verify an applicant’s eligibility, a more labor intensive, and error-prone process. As a result of these technical challenges, Lifeline enrollment and reverification has dropped precipitously in those states that have previously hard launched in the National Verifier.

NYPSC requests a temporary postponement of the timeframe for implementation of the National Verifier until December 31, 2019 or until an API can be established with the New York State Office of Temporary and Disability Assistance (OTDA), whichever is later. A postponement will allow USAC to work with OTDA to finalize an agreement and to establish an API connection. This will allow more eligible low-income New Yorkers to be enrolled and re-verified for the Lifeline program.

Respectfully submitted,

A handwritten signature in cursive script that reads "Alicia M. Sullivan".

Alicia M. Sullivan, Deputy Counsel
On behalf of Robert Rosenthal, General Counsel

³ See, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd. 3962, 4021-4040, paras. 167-216 (issued April 27, 2016) (Lifeline Modernization Order).